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Attorney for Defendant
JENNIFER FRENCH

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

CASE NO. 3:08-CR-0006-LHR-RAM

Plaintiff,

vs.

MOTION TO AMEND CONDITIONS
OF RELEASE

DARIN JEROME FRENCH,
JENNIFER LYNN FRENCH,

Defendants.

COMES NOW, the Defendant, Jennifer Lynn by and through her counsel, Mary E. Boetsch, Esq., CJA, and hereby moves this Court for its Order modifying the conditions of pretrial release to permit the Defendant to travel to the Los Angeles area in the Central District of California in order to visit her husband, Darin Jerome French, who is currently incarcerated at Los Angeles Metropolitan Detention Center. This travel will be subject to advance notice and permission specifics as required by Pretrial Services.

We also ask that the conditions of pretrial release be amended to permit travel to other destinations, primarily in


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1 Northern California, with the pre-approval of Pretrial Services.
 2 This request is to allow Ms. French to take her children to
 3 their physicians and to occasionally visit with relatives and
 4 the children's godparents.
 5

6 In addition, we ask that the conditions of pretrial release
 7 be amended to also permit travel between Susanville and Reno.
 8 Currently, the conditions limit travel between Truckee and Reno,
 9 as they were not amended after Ms. French returned to
 10 Susanville.

11 Undersigned counsel has discussed this with both Ms. Simone
 12 with Pretrial Services and with William Reed, Esq., Assistant
 13 United States Attorney, and Megan Rachow, Esq., Assistant United
 14 States Attorney. All have indicated their approval of these
 15 changes.

16 DATED this 10th day of June 2010.

17 
 18 MARY E. BOETSCH, ESQ.
 19 Counsel for Defendant
 20 Jennifer Lynn French

21 IT IS SO ORDERED.

22 DATED this 6th day of July, 2010.

23 
 24 UNITED STATES MAGISTRATE JUDGE
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